

4.10 ENVIRONMENTAL JUSTICE

4.10.1 Impacts of the Proposed Master Plan

The impacted area (Census Tract 265 where Park Lake Homes is located) has significant concentrations of both low-income and minority populations (see Figure 3.9-2). Because of these concentrations, demolition and construction activities entailed in the redevelopment of the project site would affect a disproportionately higher number of low-income and/or minority households than would similar activities in another location. The EPA publication entitled *Final Guidance for Incorporating Environmental Justice Concerns in EPA's NEPA Compliance Analyses*, (April 1998), gives the following direction about how to analyze the impacts of proposed actions on low-income and minority populations.

“Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population.”

Construction

Redevelopment under the Proposed Master Plan would result in the demolition of all existing residential structures. All residents would need to be relocated from the project site to accommodate the demolition and construction activities. All relocated residents would incur moving costs and the inconvenience associated with relocating from their homes and finding comparably affordable housing.

KCHA proposes a package of relocation benefits, including options for payment of moving costs, assistance with the physical move, temporary or permanent¹ relocation to units in other KCHA-owned properties, and Section 8 Vouchers for either temporary or permanent relocation. Proposed relocation benefits are in compliance with the Uniform Relocation Assistance and Real Property Policies Acquisition Act of 1970 (URA) as required by the HOPE VI Program. All residents in good standing with KCHA would have the right to return to a unit in the redeveloped community, but residents also have the option of moving permanently from the site.

The Proposed Master Plan would reduce the current 569 public housing units on-site to 300. KCHA proposes to replace the units on a one-for-one basis with limits of like affordability. Three hundred (300) units would be replaced on-site and 269 units would be replaced off-site (see *Section 4.9, Land Use and Socioeconomics*, Housing subsection for additional information). In addition, if more than 300 current residents choose to return to the Greenbridge community, Vouchers would be available for all households choosing to return.

¹ Under the Uniform Relocation Assistance and Real Property Policies Acquisition Act of 1970 (URA), KCHA would be required to offer residents the relocation benefits associated with permanent relocation, based on federal definitions. For purposes of the EIS, however, residents who plan to return to a new unit after redevelopment will be considered “temporarily relocated” and those who do not plan to return will be referred to as “permanently relocated.”

Operation

Community Cohesion

Implementation of the Proposed Master Plan would likely impact community cohesion through changes in the existing demographics. In addition, a temporary disruption of community cohesion would likely occur from the relocation of residents during demolition and construction. However, reducing the concentration of extremely low-income and very low-income households on the site, and thereby reducing or eliminating some of the social consequences of such concentrations, is an objective of the HOPE VI grant program. Creating opportunities for economic diversification of the community, while still providing for the housing needs of those public housing residents who wish to return after the redevelopment, is one of the major planned outcomes of the project.

Access to Social Services

Residents of Park Lake Homes are currently served by a number of on-site social services for low-income people (i.e., Highline Head Start, Neighborhood House, White Center Food Bank). KCHA's relocation plan specifically addresses the need to maintain service connections for residents as part of relocation assistance. Relocation staff would identify the service needs of each household and link residents with comparable services in areas to which they relocate. KCHA Resident Service Area Administrators would inventory services in various geographic areas of the County and assist residents in accessing appropriate services. Relocation staff would arrange service connections for residents before they relocate and follow-up once the resident has moved off-site. Residents relocating in White Center, or the surrounding area, would be able to maintain their service connections with on-site providers.

Public Health

The Proposed Master Plan calls for elimination of existing site-related health hazards. Demolition of the current structures would eliminate potential exposure to the lead-based paint and asbestos that currently exist. Any residents on-site when demolition and construction occurs would not be disproportionately exposed to hazardous materials or public health hazards since removal of any hazardous materials must comply with current regulations for abatement and/or disposition of such substances. Residents both on-site and in the surrounding area could be exposed to increased levels of air pollution and noise during construction, and to a limited degree in the future, primarily due to increased traffic (see Air, Noise, and Traffic sections of this Draft EIS for further discussion).

Public Well Being

The Proposed Master Plan includes new and expanded community facilities and all new housing units. A more traditional street grid would replace the existing curvilinear streets to better connect Greenbridge physically to the surrounding community. Parks and open space would be expanded and enhanced providing a greater variety of amenities (see *Parks and Recreation, Section 4.13*). Many elements of the new community (i.e., street patterns, building design, open space, pedestrian and vehicular access) have been planned to promote a pedestrian orientation and improve public safety. One of the intended outcomes of the community design represented by the Proposed Master Plan is enhancement of the public well-being.

Other aspects of the project intended to increase public well-being are additions to the site such as a King County Branch Library. The new White Center Elementary School, currently under construction, is a separate project but would also contribute to public well-being. The economic and social diversity that would result from the work force and for-sale housing on-site are also intended to promote community stability and well-being.

Cumulative Impacts

The cumulative impacts on King County public housing residents of four unrelated HOPE VI redevelopments [Greenbridge (KCHA), New Holly, Rainier Vista, and High Point (SHA)] are analyzed as part of the housing impact analysis in *Section 4.9, Land Use and Socioeconomics*. The conclusions of that analysis, which are also applicable to environmental justice issues, are that the cumulative mitigation measures (relocation benefits, resident involvement in relocation planning, and one-for-one replacement housing) incorporated in each project, would address potential cumulative impacts.

4.10.2 Impacts of the Alternatives

Design Alternative Master Plan

The impacts of the Design Alternative Master Plan related to environmental justice would be the same as those of the Proposed Master Plan.

No Action Alternative

The No Action Alternative would not involve construction and would require no relocation of residents, resulting in no related impacts on the minority and low-income populations living on the site. However, at the same time, the No Action Alternative would not significantly improve the existing housing conditions or the standard of living for current or future residents. The community would continue as a concentration of extremely low- and very low-income households, challenged by the existing social, economic, and physical barriers that separate them from full integration with the surrounding community.

Residents would continue to experience the poor condition of the housing units, given that adequate resources to make significant improvement would not be available. And, as the structures and infrastructure continue to deteriorate, the risk increases that all residents would eventually be displaced when units can no longer be rented due to their substandard condition and/or the failure of on-site utility systems.

In addition, the No Action Alternative would mean that the 569 Vouchers that KCHA received in conjunction with the HOPE VI funding would be recaptured by HUD. Under each of the action alternatives, over half of the Vouchers (296) would be used to provide relocation assistance for current residents of Park Lake Homes. As recipients of those Vouchers gain economic self-sufficiency and no longer need rent assistance, the Vouchers would be added to the overall pool of Vouchers administered by KCHA, thereby increasing housing assistance resources countywide. Under the No Action Alternative this opportunity would be lost.

4.10.3 Mitigation Measures

The long-term impacts of the Proposed Master Plan and the Design Alternative Master Plan on the resident low-income and minority populations at Park Lake Homes would be positive, and are intended to address the challenging physical conditions and social issues that currently exist. The proposed mitigation measures discussed under housing address the short-term impacts resulting from the demolition and construction activities under either alternative (see the *Land Use and Socioeconomics* section of this Draft EIS).

4.10.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated over the long-term. In the short-term, existing residents would experience the inconvenience attendant to relocation and construction, but would be provided with multiple types of moving and relocation assistance.